

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

JAMES PETER CONLAN

Plaintiff,

v.

MIDDLE STATES ASSOCIATION OF
COLLEGES AND SCHOOLS and THE
MID-ATLANTIC REGION COMMISSION
ON HIGHER EDUCATION doing business
as MIDDLE STATES COMMISSION ON
HIGHER EDUCATION,

Defendants.

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CIVIL NO. 15-2841 (CCC)

**MOTION FOR ENLARGEMENT OF TIME TO ANSWER, MOVE, OR OTHERWISE
PLEAD**

TO THE HONORABLE COURT:

NOW COME Defendants Mid-Atlantic Region Commission on Higher Education (“MARCHE”), *doing business as* the Middle States Commission on Higher Education (MSCHE), and Middle States Association of Colleges and Schools (“MSACS”), through their undersigned attorneys, and respectfully set forth and pray:

1. The Complaint in this case was filed on November 16, 2015. Copies of the Complaint and of the Summons directed at MARCHE, MSCHE, and MSACS were served on March 10, 2016. Therefore, the answer to the complaint or a motion to dismiss is due on March 31, 2016.

2. Defendants retained the undersigned attorney and law firm to represent it in this case. They have been working assiduously to gather the information required to prepare an answer to the Complaint. Nonetheless, it has not been possible to conclude its work at this time, and the

defendants respectfully request that this Court enlarge the term by thirty (30) days, and that the time to file any such document lapse on April 30, 2016.

WHEREFORE, it is respectfully requested from this Honorable Court that it enlarge the time to answer the complaint, move to dismiss, or otherwise plead to defendants until April 30, 2016.

I CERTIFY: That on this same date this document was filed with the Court's CM/ECF System, which will send a copy to James Peter Conlan, San Mateo Plaza, Apt. PH-3, 1626 San Mateo St., San Juan, PR 00912.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 30th day of March, 2016.

S/ Carlos A. Rodríguez Vidal
U.S.D.C. #201213

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